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7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 10 11 12 13 14 15	BRANDON ROCHE, Plaintiff, vs. DIEGO GUZMAN, and TSG FLEET SERVICES, LLC, a California Limited Liability Company; DOES I – X, and ROE CORPORATIONS XI – XX, inclusive, Defendants.	CASE NO: 2:23-cv-00488-CDS-EJY <u>STIPULATION AND ORDER TO</u> <u>EXTEND DISCOVERY DEADLINES</u> <u>(FIRST REQUEST)</u>
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16 IT IS HEREBY STIPULATED, by and between the parties through their undersigned
17 counsel of record, WILLIAM W. McGAHA, ESQ., of SCHUETZE, McGAHA, TURNER &
18 FERRIS, PLLC, counsel for Plaintiff, and TREVOR R. WAITE, ESQ., of FABIAN VANCOTT,
19 counsel for Defendants, as follows:

20 The parties stipulated and respectfully request that this Honorable Court extend the
21 discovery deadlines, and all deadlines arising therefrom, found in their Discovery Plan and
22 Scheduling Order, originally filed July 17, 2023, in this matter as set forth below:

23 **A. Discovery Cut-Off:**

- 24
25 a. Current Deadline: March 26, 2024
26 b. New Deadline: April 26, 2024

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1 **B. Initial Expert Disclosures & Reports:**

- 2 a. Current Deadline: January 26, 2024
3 b. New Deadline: February 26, 2024

4 **C. Rebuttal Expert Disclosures & Reports:**

- 5 a. Current Deadline: February 26, 2024
6 b. New Deadline: March 26, 2024

7 **D. Motion to Amend Pleadings & Add Parties:**

- 8 a. Current Deadline: December 27, 2023
9 b. New Deadline: January 26, 204

10 **E. Interim Status Report:**

- 11 a. Current Deadline: March 16, 2023
12 b. New Deadline: June 16, 2023

13 **F. Dispositive Motions:**

- 14 a. Current Deadline: April 25, 2024
15 b. New Deadline: May 25²⁷, 2024

16 **G. Pre-Trial Order:**

- 17 a. Current Deadline: May 27, 2024
18 b. New Deadline: June 27, 2024

19 The parties to this action are not making this request for the purpose of unduly delaying
20 the trial in this matter. The parties are diligently working together to complete discovery and the
21 additional time will help provide time for meaningful ADR as there are complicated insurance and
22 unusual insurance coverage issues. Additionally, Plaintiff BRANDON ROCHE is claiming
23 extensive injuries arising from the subject collision, requiring reports from multiple medical
24 experts, as well as depositions of both parties and said experts. Defendants are located in
25 California.

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1 To date, parties have served written discovery and disclosures. The Defendant has
2 responded to written discovery and Plaintiff is drafting response to written discovery.
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4 Defendant Diego Guzman was deposed on September 21, 2023. Plaintiff's deposition
5 needs to be taken as well as the Person Most Knowledgeable for Defendant TSG Fleet Services,
6 LLC.

7 After all depositions have been completed and the transcripts and/or reports received,
8 additional discovery may be pursued to explore and/or clarify any issues that arose during the same.

9 Therefore, the parties require additional time to complete the full extent of discovery. They
10 therefore stipulate to extend the discovery deadlines, and all deadlines arising therefrom, as set
11 forth above.

12 **DATED** this 19th day of October 2023.

13 **SCHUETZE, McGAHA TURNER**
14 **& FERRIS, PLLC**

15 By s/William W. McGaha
16 WILLIAM W. McGAHA, ESQ.
Nevada Bar #3234
601 S. Rancho Drive, Suite C-20
Las Vegas, Nevada 89106
Attorneys for Plaintiff

17 **DATED** this 19th day of October 2023.

18 **FABIAN VANCOTT**

19 By s/Trevor R. Waite
TREVOR R. WAITE, ESQ.
411 E. Bonneville Avenue, Suite 400
Las Vegas, Nevada 89101
Attorneys for Defendants

20 Roche v. Guzman, et al
21 CASE NO: 2:23-cv-00488-CDS-EJY
22 Stipulation & Order to Extend Discovery

23 **ORDER**

24 IT IS SO ORDERED this 19th day of October 2023.

25 
26 UNITED STATES MAGISTRATE JUDGE
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